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October 10, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O’Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch:

On behalf of the Performing Arts Services department, College of Arts + Architecture at the University of North Carolina at Charlotte, we write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. The Performing Arts Services department supports the academic and production goals of the Departments of Theatre, Dance, and Music at the University, and in doing so is involved in the production of well over 100 performances annually. We routinely have over 8,000 patrons attend our performances each year, and these productions involves several hundred students as performers, designers, and technicians, as well as professional guest artists in all areas of the performing arts.

We strongly support the Commission’s proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating

significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

A typical year for our department involves the support of four to six theatrical productions, four to six dance productions, and 60 to 90 musical events. While each semester needs a few weeks to get “up and running” so-to-speak, once performances begin, it is not unusual to have three to five performances per week, and occasionally overlapping productions in multiple areas. Most, if not all of these productions utilize wireless audio, from a single handheld microphone to address the audience or instruct students, to 20 to 30 wireless microphones, multiple channels of wireless intercoms, and several channels worth of in-ear monitors. These wireless devices are critical to the professional production standards we attempt to instill in our students, and prepare them for careers outside of the academic world.

Many of our wireless microphones currently exist the lower UHF band, and this are not affected by the recent auctions; however some of our intercom equipment and our in-ear monitoring equipment is in the upper UHF band, and is now affected by the most recent auction. Some of this gear was fairly recently purchased, and is now needing to be replaced in short order to maintain compliance with the law and also maintain our ability to support performances in our venues. Our gear is analog, and thankfully has a tuning range of 75 to 100 MHz; however units that are in the 600 MHz band must now be replaced. As our units reach end-of-life, we are anticipating replacement with digital equipment, which generally allows more units in the same amount of bandwidth. Due to the sheer amount of use our equipment receives in an academic year, we do not generally rent wireless audio equipment.

At a minimum of twice per academic year, and more frequently if system changes are made, the faculty audio engineer re-calculates the frequency assignments for all wireless devices in use in our venues. An audio engineer and sound designer with over ten years of experience, he holds the Master of Fine Arts in Sound Design and Technology, and uses industry standard software to allocate frequencies to avoid interference from outside sources.

We would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

One of the goals of most performing arts institutions is to improve the quality of life for the public by enhancing the cultural opportunities in the area. In addition, as an educational institution, we strive to educate not only our students, but the public as well. Educational

institutions are all being asked to do more with less, and this includes budget. The costs involved to replace equipment that was once legal to operate but is no longer is not insubstantial, but neither is it optional - we owe it to our students to train them on professional equipment, and to allow them to have as professional a performance as possible.

We appreciate the opportunity to provide Public Comment on this issue. We strongly and respectfully endorse the Commission's proposal to accommodate educational institutions and performing arts organizations who legitimately need protection and access to reliable portions of the spectrum. The expansion of the Part 74 LPAS rules provide that access and protection, and benefit not only the organizations themselves, but the students we are training, and the members of the public who patronize our performances.

Sincerely,

Dean Adams, Associate Dean for Performing Arts Services

Benjamin G. Stickels, Senior Lecturer, Audio Engineer